

CRIMINAL RECORD

49. Have you or a member(s) of your family, or someone close to you ever been arrested for or charged with a criminal offense?

50. How was this person related to you?

51. Were you (they) convicted?

VICTIM EXPERIENCE:

52. Have you, or any member of your family, or close friend ever been a victim of a crime? If yes, who, when and what happened?

53. How had the experience affected your feelings about the criminal justice system?

LITIGATION EXPERIENCE:

54. Have you ever been a party to a lawsuit or filed a claim against a government agency? If yes, please explain.

008821

ADMINISTRATION OF JUSTICE:

55. Have you, or any member of your family, or close friend ever taken a course in the administration of justice, or studied law? If yes, please give details.

56. Have you, or any member of your family, or close friend ever been affiliated with any of the following? (if yes, please check):

- ☐ law enforcement (police officer, sheriff, F.B.I. agent, etc).
- ☐ corrections (prison guard, jailer, prison staff, jail staff)
- ☐ mental institution
- ☐ juvenile facilities
- ☐ probation and parole
- ☐ District Attorney or United States Attorney
- ☐ public defender
- ☐ law school
- ☐ investigative work
- ☐ immigration services
- ☐ drug enforcement administration

57. If you checked any of the above, please indicate who was affiliated, the nature of the affiliation, and when.

58. Do you have acquaintances who are attorneys practicing criminal law or judges? If yes, please state the names of those persons and the relation that you have with them?

PSYCHIATRY/PSYCHOLOGY:

59. How do you feel about psychiatrists and/or psychologists testifying as experts in court cases?

60. Are you familiar with psychological testing? If yes, how do you feel about the validity of these tests?

61. Have you ever studied psychiatry, psychology, or any related subjects? If yes, please explain.

62. Have you or any member of your family, or close relative ever consulted a psychiatrist or psychologist for professional services?

63. Did this consultation affect your opinion about the value of psychiatry or psychology? If yes, please explain.

008823

60. Are you familiar with psychological testing? If yes, how do you feel about the validity of these tests?

61. Have you ever studied psychiatry, psychology, or any related subjects? If yes, please explain.

62. Have you or any member of your family, or close relative ever consulted a psychiatrist or psychologist for professional services?

63. Did this consultation affect your opinion about the value of psychiatry or psychology? If yes, please explain.

DEARDORFF & HAAS
ATTORNEYS AT LAW

TIMOTHY J. DEARDORFF
LOREN S. HAAS
JAMES S. GINOCCHIO

2368 VICTORY PARKWAY, SUITE 300
CINCINNATI, OHIO 45206
(513) 872-7900
FAX: 281-6760

March 31, 1994

Mr. Dan James, Esq.
1300 American Building
30 E. Central Parkway
Cincinnati, Ohio 45202

Re: Lee Edward Moore

Dear Dan:

I had a conversation with Chuck Stidham in regard to being our mitigation expert. I personally think that one is necessary in every aggravated murder case. I will be on vacation until April 11th. I have asked Chuck to contact you in regards to filing that motion.

Secondly, I have had extensive interviews with Lee Edward Moore in the jail and I would like to speak to you in regard to his status as far as the first phase. I also think that we should move for a 3 judge panel to see who we would obtain and hopefully roll a judge who would be persuaded by the arguments in mitigation. I will await to hear from you in that regard when I return. It may be beneficial that you, I and Chuck Stidham have a meeting before we proceed with any motions. However, I will concur, obviously, with anything you would do in my absence.

Very truly yours,

DEARDORFF & HAAS

TIMOTHY J. DEARDORFF

TJD/jp

008825

DEARDORFF & HAAS
ATTORNEYS AT LAW

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LOREN S. HAAS
JAMES S. GIMOLUCHIO

169 EAST McMILLAN — CINCINNATI, OHIO 45219
(513) 241-4030
FAX 241-5724

GEOFFREY W. PITTMAN

February 24, 1994

Mr. and Mrs. Lee Moore, Sr.
1101 Clearbrook Dr.
Cincinnati, OH 45229

RE: Lee Edward Moore, Jr.

Dear Mr. and Mrs. Moore,

Please be advised that the above referenced case is set for Motion to Suppress Thursday, May 5, 1994 at 9:00 a.m. before Judge William Morrissey, room 360; Monday, June 27, 1994 at 10:00 a.m., and Tuesday, July 26, 1994 at 9:00 a.m. for Jury trial.

Should you have any questions or concerns, please feel free to call.

Very truly yours,

DEARDORFF & HAAS

TIMOTHY J. DEARDORFF

hh

008826

COURT OF COMMON PLEAS
ASSIGNMENT COMMISSIONER
ROOM 355-COURTHOUSE
COURT & MAIN STREETS
CINCINNATI, OHIO 45202

B- 940481

STATE OF OHIO
MODRE/LEE VS

01/31/94

THIS CASE IS SET FOR
PRE-TRIAL

02/09/94 AT 1100 AM
IN ROOM 360 BEFORE
JUDGE
MORRISSEY/WILLIAM

COURT OF COMMON PLEAS
ASSIGNMENT COMMISSIONER

* 1101 Clearbrook Dr. (29)
*

008827

Lee Edward Moore, Jr.

Beverly Parker 7950 Cherrywood Ct. Cincinnati, Ohio 45244	729-1760 H 626-3525 W	sister
Lee Moore Sr. & Betty 1101 Clearbrook Dr. Cincinnati, Ohio 45229	242-1482 H	Dad & Step M.
Sandra Fetuga 3031 Cleinview Ave. Cincinnati, Ohio 45206	861-6649	friend of family
Vernena (Moore) Simpson 1855 Dale Wood Place Cincinnati 45237	242-3924	sister
Tommie Cullbreath 8517 Shuman Lane Cincinnati, Ohio 45231	931-5151	Georgia Moore's sister
James E. Robinson, Jr. 3250 Rammlesberg Cincinnati, Ohio 45206	861-5180	(1st cousin)
Georgia L. Moore 1280 Meredith Drive Cincinnati, Ohio 45231	522-0990	Mother
Vernie Besley 3554 Kenoak Lane Cincinnati, Ohio 45213	561-5120 W	½ sister (Father)

DANIEL J. JAMES
ATTORNEY AND COUNSELOR AT LAW
13TH FLOOR, AMERICAN BUILDING
30 EAST CENTRAL PARKWAY
CINCINNATI, OHIO 45202

(513) 721-1995

SUBURBAN OFFICE
4226 BRIDGETOWN ROAD
CINCINNATI, OHIO 45211
(513) 574-5400

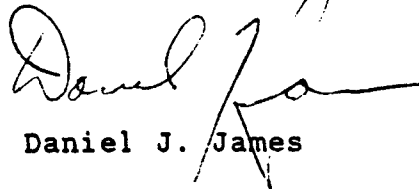
February 18, 1994

Mr. Timothy Deardorff
Attorney at Law
169 E. McMillan Street
Cincinnati, Ohio 45219

Dear Tim:

Please find enclosed a copy of the Entry of Continuance and the Discovery that I picked up when in court earlier today. I'll give you a call next week to discuss the appropriate notions that need to be filed.

Sincerely yours,



Daniel J. James

DJJ/kw
Encl.

008829

LAW OFFICES

CHUCK R. STIDHAM
CHRISTOPHER J. BERNARD

SAND, STIDHAM AND BERNARD

317 W. BENSON STREET
READING, OHIO 45215
(513) 761-4929
FAX (513) 761-3573

*ROBERT G. SAND
(1932-1990)
*HARRY A. SAND
(1922-1987)

February 2, 1994

Timothy Deardorff
Attorney at Law
169 E. McMillan
First Floor
Cincinnati, Ohio 45219-2636

RE: State of Ohio v. Lee Moore

Dear Tim:

Thank you very much for considering Mr. Vonderhaar and myself to be the Mitigation Specialists in reference to the above case. Steve and I would like very much the opportunity to speak with you as quickly as possible so as the ground work, foundation and parameters of our duties and obligations is clearly set forth.

Mitigation Specialists of Southwest Ohio charges the fee of \$35.00 per hour plus nominal expenses in the event of long distance telephone calls or mileage. We look very much forward to the opportunity of working with you in the representation of Mr. Moore.

Very truly yours,



Chuck R. Stidham
Attorney at Law

CRS/tas

008830

DANIEL J. JAMES

ATTORNEY AND COUNSELOR AT LAW
13TH FLOOR, AMERICAN BUILDING
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241-0154

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(513) 574-5400

February 3, 1994

Mr. Timothy J. Deardorff
Attorney at Law
Deardorff & Haas
169 East McMillan
Cincinnati, Ohio 45219

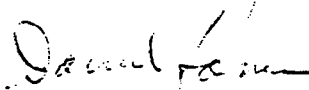
Re: State of Ohio vs. Lee Moore
Case No. B9400481

Dear Tim:

When we spoke in Court earlier this week we talked about the numerous filings that are required to be filed in a capital case. You indicated that you had the most recent and updated motions in your computer.

I ask you to send or fax to me a listing of these motions. In this manner we can review which motions are appropriate. I would like to get the majority of these motions filed within the next couple of weeks. If you have any questions, give me a call.

Sincerely yours,



Daniel J. James

DJJ/kw

008831

TIMOTHY J. DEARDORFF
LOREN S. HAAS
JAMES S. G'NOCCIO

2368 VICTORY PARKWAY, SUITE 300
CINCINNATI, OHIO 45206
(513) 872-7900
FAX 281-6760

February 1, 1995

Mr. Lee Edward Moore, #300-700
Southern Ohio Correctional Facility
P.O. Box 45699
Lucasville, Ohio 45699

Dear Lee:

Enclosed please find a copy of the regular calendar scheduling order issued by the Court of Appeals for your case. As you can see, the court reporter will have the transcripts filed by March 20, 1995, then we will be required to file a brief on your behalf by June 20, 1995. The prosecutor will then file a brief on behalf of the State by September 20, 1995. We will then have 10 days to file a reply brief, addressing the arguments the State has made. The Court of Appeals will schedule a hearing sometime after that, probably in November, 1995.

I will be handling much of the research and drafting for your appeal. If you have any questions or comments, please do not hesitate to write me.

Sincerely yours,

DEARDORFF & HAAS

CURTIS J. HAMILTON, III
Senior Law Clerk

CJH/jp
enclosure

dictated but not read

008832

P H O N E M E M O	TO	Jean		DATE	2-15	TIME	9:55	AM					
	FROM			AREA CODE									
	OF	Betty Moore		NO.	Change of								
	M E S S A G E			EX	address								
		Lee Moore Jr.											
		#305 700											
PO Box 788													
Mansfield Correctional Institute													
Mansfield OH 44901-0788													
PHONED <input type="checkbox"/>		CALL BACK <input type="checkbox"/>		RETURNED CALL <input type="checkbox"/>		WANTS TO SEE YOU <input type="checkbox"/>		WILL CALL AGAIN <input type="checkbox"/>		WAS IN <input type="checkbox"/>		URGENT <input type="checkbox"/>	

008833

COURT OF COMMON PLEAS
HAMILTON COUNTY, OHIO

JUDGE ROBERT P. RUEHLMAN
Court of Common Pleas
Hamilton County, Ohio

The State of Ohio

Plaintiff

vs.

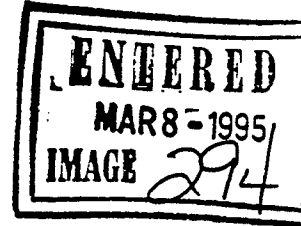
Lee Edward Moore

Defendant

Case No. B940481

(Judge Ruehlman)

ORDER GRANTING LEAVE TO APPEAL IN
FORMA PAUPERIS, AND FOR
TRANSCRIPT AT PUBLIC EXPENSE



This cause came on to be heard on the motion of defendant for leave to appeal in forma pauperis, and for a transcript of proceedings at public expense, and the Court, for good cause shown, finds that the defendant is indigent and unable to afford to prosecute his appeal from the judgment and sentence of this Court herein, and is entitled to proceed in forma pauperis, pursuant to State ex rel. Siegler V. Rone (1975, 42 Ohio St.2d 361, 328 N.E.2d 811.

THEREFORE, IT IS ORDERED that defendant is hereby granted leave to appeal in forma pauperis, without cost, and that he shall be provided a transcript of the proceedings herein at public expense, to be taxed in the costs, or otherwise paid as provided by law.

Robert P. Ruehlman, Judge

008834

Form OPD-206

OHIO PUBLIC DEFENDER COMMISSION

8 East Long Street, 11th Floor

Columbus, OH 43215

(614) 466-5394

Hamilton County

Name Lee E. MooreCase No. B94 00781

Affidavit of Indigency

I, Lee E. Moore, being duly sworn, say:1. I am accused of the crime of AGGRAVATED MURDER;

2. I am financially unable to retain private counsel without substantial hardship to me or my family;

3. I understand that I must inform the Assigned Counsel if my financial situation should change before the disposition of my case;

4. I understand that if it is determined by the county, or by the court, that the legal representation that was provided for me, to which I was not entitled, I may be required to reimburse the county for the costs of representation provided. Any action filed by the county to collect legal fees hereunder, must be brought within two years from the last date legal representation was provided.

X Lee E. Moore Jr.

NOTARY ATTEST

Sworn before me and subscribed in my presence this 22nd day of January, 1994James A. Nichols
my commission does not expire

Form OPD-206 is required under Section 120.33 Ohio Revised Code

008835

S7 v. Brewer - 48 off S7 3d 50
(1990)

5/5/ L. E. NOONE : HEARING - NOON TO SUPPERS
STATION

L1 - MARK DONOVAN, SGT.

WITNESS 07 HENRY P.D.

- 5:23 pm

- I was in uniform & marked cruiser

- MC DONALD'S RESTAURANT

- I pulled into shopping center lot to have
access to McDonald's drive

- the plain clothes detective had
already gotten h.e. move out of
the car - had her up against
the side of the body

- I didn't smell any marijuana
from the vehicle

- I had a conversation w/ him in
my car later on - I took him
from McDonald's to St. Healthy P.D.

"What is this about?"

h.e. internally repeated

- did not smell marijuana, I did
not see glassy eyes, or behavior

- it was a cold day

- he was wearing a sweat shirt

I had
a
coat

1
see

008836

- I did not advise him of any of his rights

he was
in
custody

- when I put the cuffs on him

- not sure if I removed the handcuffs

- holding cell - I only has a cement

what
time?

- he put her in

- he was put in another room - 7 men/pals
officers were present - they interviewed
him

- Det. Kenneth took some of his
clothing - (I

hours - he told 10:15 morning is transported
in her to Breckley

holding
cell

- he was not interviewed for

where OFFICER KENNEDY

2

Detective - Capt of Det Heavilly

- I first saw him at 6:00 pm at the
Det. Heavilly P.D.

- no snow on the ground, it was cold

- he had a sweatshirt, hat, pants

- I don't know if he had a coat or jacket

- I had no conversation w/ defendant

- I had made a previous check on him as to

008837

address ~~reg~~ from school officials
 - address - Meredith Dunn - Springfield
 Illinois

Type 2: - I removed the a hat, sweatshirt, shirt, pants
 - I did not take his shoes
 - he was given ~~the~~^a coat when transported
 - don't know whose coat
 - we had blankets in the holding cell
 - he had no clothes from the ~~bottom~~^{basement} up
 - he never spoke w/ me

see
 with
 he asked
 ask him
 why he
 was by
 himself
 - I was there from 6-9 pm
 - he was not fed
 - Officer Asst Chief Adams took him down to the
 - I did not try to contact him further

Crow & Regnier

- he was lying down on the bed
 - he never asked for anything to eat or drink
 - I took clothes - transferred his possessions
 of things purchased of the credit card of
 Mr. Seeger.

- send w/ nursing station in the cell

Remond OHMSEA - Asst Prison Chief

- came in contact w/ him when I came to
 work at 10:30 pm. I saw him in the
 cell

- I don't think he was cuffed
 - I don't remember if he was wearing a shirt or was
 bare chested - I don't believe he had a shirt on

008838

- he was on steady feet
- I didn't know when his shoes were
- I don't know who took his shoes
- I took him downtown 10:15 A.M.
- I spoke to the warden where ~~was~~ we were going & told him

- he was in custody - but not free to leave

- I put the cuffs on him, behind his back

- I did not advise him of his rights but I returned an officer from Fairfield advise him of his rights

→ this was done in the holdy call

- I gave the Fairfield officer a rights statement - the Fairfield officer said he along read him his rights

- I was called out

- he was given a jacket - I had to be his jacket

- we did not give him shoes.

- there was shoes on the ground

- there was shoes on the ground

- Exhibit #6 - rights statement

- I double park parked on Broadway - I took him into ^{C.I.S.} Criminal Investigation Section

- "he did complain about walking through the shoes"

- I couldn't blame him

last night I put ~~was~~ (1:20 or so) when he arrived

Write Journal

P. O. City of Springfield

- I was w/ Det Bob Bennett
- we were met
- I identified myself & told him to put his hands on the steering wheel
- I made him get out, put his hands on the trunk of the car
- I cuffed him - I didn't tell him why he was ~~was~~ being held
- I told him later - when we arrived at C.I.S. - 6 hours later
- no smell of marijuana
- not glossy eyes
- no slurred speech
- I don't recall seeing his cuffs when we put him in the body cell

State Exhibit 6 - Muzzle rights form

- I read the form to him
- I do this when I ~~was~~ arrest anyone
- I didn't tell him why he was being arrested (I did this after midnight)

- I don't know if his shoes were taken
- there was snow & sleet. slash
- he was not incarcerated when he was transported